

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK
(Albany Division)**

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF NEW YORK; KATHLEEN HOCHUL, Governor of New York, in her Official Capacity; LETITIA A. JAMES, Attorney General of New York, in her Official Capacity; MARK J.F. SCHROEDER, Commissioner of the New York State Department of Motor Vehicles, in his Official Capacity.

Defendants.

No. 1:25-cv-205-AMN-MJK

**PLAINTIFF'S NOTICE OF
CROSS-MOTION FOR SUMMARY JUDGMENT**

Please take notice that Plaintiff United States of America, by and through its undersigned counsel, moves this Court to enter summary judgment in its favor on all of its claims under Federal Rule of Civil Procedure 56 and Local Rule 56.1 for the reasons explained in the attached memorandum of law, which is consolidated with Plaintiff's opposition to Defendants' Motion to Dismiss, ECF No. 10, in accordance with Local Rule 7.1(c).

DATED: April 25, 2025

Respectfully submitted,

YAAKOV M. ROTH
Acting Assistant Attorney General
Civil Division

ERIC J. HAMILTON
Deputy Assistant Attorney General

ALEXANDER K. HAAS
Director

JACQUELINE COLEMAN SNEAD

Assistant Director

/s/Cristen C. Handley

CRISTEN C. HANDLEY (MO Bar # 69114)

ELISABETH J. NEYLAN (NY Bar # 6125736)

Trial Attorneys

United States Department of Justice

Civil Division

Federal Programs Branch

1100 L Street NW

Washington, D.C. 20005

Tel: 202-305-2677

Fax: 202-616-8460

E-mail: Cristen.Handley@usdoj.gov

Attorneys for the United States